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14 UNITED STATES DISTRICT COURT  
15 SOUTHERN DISTRICT OF CALIFORNIA

16 MS. L, *et al.*,

17 Petitioners-Plaintiffs,

18 vs.

19 U.S. IMMIGRATION AND CUSTOMS  
20 ENFORCEMENT, et al,

21 Respondents-Defendants.  
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Case No. 3:18-cv-0428 DMS MDD

**STATUS REPORT REGARDING  
EXPANDED MS. L CLASS  
IDENTIFICATION PLAN**

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1 In accordance with the Court's April 25, 2019 Order Following Status Conference,  
2 ECF No. 405, Defendants hereby submit this Status Report Regarding Expanded *Ms. L.*  
3 Class Identification Plan, which consists of the attached declaration from Commander  
4 Jonathan White. Commander White will be available during the May 17, 2019 telephonic  
5 status conference to answer any questions the Court may have.  
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7  
8 DATED: May 16, 2019

Respectfully submitted,

9 JOSEPH H. HUNT  
10 Assistant Attorney General

11 SCOTT G. STEWART  
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13 WILLIAM C. PEACHEY  
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17 /s/ Sarah B. Fabian  
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**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is Box 868, Ben Franklin Station, Washington DC 20044. I am not a party to the above-entitled action. I have caused service of the accompanying brief on all counsel of record, by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically provides notice.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 16, 2019

s/ Sarah B. Fabian  
Sarah B. Fabian

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Ms. L., et al.

Petitioners-Plaintiffs,

vs.

U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT, et al.,

Respondents-Defendants.

Case No. 18cv428 DMS MDD

Hon. Dana M. Sabraw

**DECLARATION OF JONATHAN WHITE**

I, Jonathan White, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that my testimony below is true and correct:

1. The statements in this declaration are based on my personal knowledge, information acquired by me in the course of performing my official duties, information supplied to me by federal government employees, and government records.

2. The purpose of this declaration is to update the Court on the Government's implementation of its Plan for identifying possible children of potential members of the expanded class of parents in this case.

3. On April 25, 2019, the Court approved the Government's Proposed Plan that is designed to identify substantially all class members within 6 months.

4. Since April 25, 2019, the Department of Health and Human Services ("HHS"), U.S. Customs and Border Protection ("CBP"), and U.S. Immigration and Customs Enforcement ("ICE") Operational Leads have consulted and developed a work-flow process to optimize interagency validation and consolidation of information.

5. In addition, a team of U.S. Public Health Service Commissioned Corps ("USPHS") Officers has been created, deployed and trained to conduct case file review as part of a pilot project. As of May 13, the USPHS case file review pilot team had

1 conducted preliminary UAC Portal case file review of 4,108 cases. These cases are for  
2 the prioritized populations such as the list produced by CBP of children separated after  
3 April 19, 2018; the informal tracking list of children identified as separated by ORR  
4 beginning in 2017; and children referred to ORR during the class expansion period who  
5 were 12 years of age or younger on the date of referral.

6 6. On May 6 and 13, HHS transmitted data sets on minors with some  
7 preliminary indication of separation to CBP and ICE for further assessment,  
8 reconciliation with CBP and ICE information, and determination of potential parental  
9 class membership. The data sets are currently under review at CBP and, as CBP review is  
10 completed, will move to ICE.

11 7. HHS is expediting the procurement to hire and train a team of data scientists  
12 and scalable teams of record reviewers. HHS is in the process of engaging a Federally  
13 Funded Research and Development Center to provide this skilled labor and support. The  
14 procurement is proceeding rapidly toward finalization. Ordinarily, Federal procurements  
15 for services of this type would require a minimum of four months, but this process is being  
16 expedited.

17 8. Once DHS has completed its reconciliation process and potential class  
18 membership is determined, the Government will provide lists of potential class members to  
19 Plaintiffs on a rolling basis.

20 Executed on May 16, 2019.

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A handwritten signature in black ink, appearing to read "Jonathan White", is written over a horizontal line.

Jonathan White